

## Remote Gambling Equipment

Advice note, March 2008

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### 1 Introduction

- 1.1** This document sets out our interpretation of which elements of a gambling system will meet the definition of remote gambling equipment ('key equipment') set out in the Act. It provides additional advice for those completing the Gambling Commission's application forms. Please see our website for the application forms and the standard Guidance Notes for those forms.
- 1.2** The information contained in this document is intended to provide advice to operators on identifying key equipment; it is not intended in any way to replace the definition set out in the Act.

### 2 Background

- 2.1** If an operator providing facilities for remote gambling locates any 'remote gambling equipment' (sometimes referred to as 'key equipment') in Great Britain that operator will have to hold a form of remote gambling licence whether or not those facilities are provided for use wholly or partly in the United Kingdom. The Act defines remote gambling equipment in Section 36(4) and sets out some specific exclusions in 36(5):

(4) In this Act 'remote gambling equipment' means, subject to subsection (5), electronic or other equipment used by or on behalf of a person providing facilities for remote gambling:

- (a) to store information relating to a person's participation in the gambling
- (b) to present, to persons who are participating or may participate in the gambling, a virtual game, virtual race or other virtual event or process by reference to which the gambling is conducted
- (c) to determine all or part of a result or of the effect of a result: or
- (d) to store information relating to a result

(5) In this Act 'remote gambling equipment' does not include equipment which:

- (a) is used by a person to take advantage of remote gambling facilities provided by another person; and
- (b) is not provided by that other person

### 3 Reading this document

- 3.1** In this document we use the term 'component' to refer to software that is run by (executed) or data that is stored on a piece of equipment. A component fulfils a specific purpose (for example, an RNG is a component that generates random numbers); a piece of equipment may host one or more components.
- 3.2** Under the heading 'Facilities for gambling and remote gambling equipment' we provide advice on and specific examples of the Commission's interpretation of whether equipment is used in the provision of facilities for gambling.
- 3.3** Under the heading 'Remote gambling equipment' we list those components that we believe meet the definition set out in the Act.

**3.4** In order to set the components into context this document also contains a gambling system overview, a component glossary and a number of high-level diagrams. The diagrams are not intended to describe any particular gambling system nor do they define the way a gambling system should be implemented.

## **4 Facilities for gambling and remote gambling equipment**

**4.1** Based on our interpretation of the Act a piece of equipment is remote gambling equipment if it is “used in the provision of facilities for gambling” and the components deployed on it perform one or more of the functions set out in 36(4)(a) to (d).

**4.2** In order to assist operators to identify their key equipment this section provides advice on our interpretation of “used in the provision of facilities for gambling” in the context of remote gambling equipment. Under the heading ‘Remote gambling equipment’ we list those components that we believe meet the definition set out in the Act.

**4.3** We read “used in the provision of facilities for gambling” as relatively narrow and as not extending to all equipment used by a remote gambling operator generally in connection with, or incidentally to, the provision of the gambling. Thus, for example - and based on our present understanding of such systems in use in the remote gambling industry - we do not consider equipment used for integrity testing, money laundering compliance and monitoring, complaints handling and responsible gambling analysis to be “used in” the provision of the gambling activity because they are not used by the customer or operator as part of that gambling. Below are further specific examples.

## **5 Marketing, bonuses and incentives**

**5.1** Operators typically keep some data about customers and their previous gambling activities for the purpose of marketing, including offering bonuses and other incentives related to the amount that a customer has gambled with the operator. This data may be stored separately from similar data stored in other parts of the operator’s infrastructure.

**5.2** In the case of equipment which stores information relating to customers’ participation in the gambling and which is used for bonus and reward calculations, we consider only the core system whose principal function is to offer, operate and settle the gamble to be “used in” the provision of facilities for gambling. Therefore, whilst we would consider systems used to calculate bonuses or other rewards or incentives which are *awarded or determined during the course of a single gambling transaction or session of “play”* (whether the activity is betting, gaming or participating in a lottery) to be remote gambling equipment, we would not necessarily take the same view of systems that only operate to calculate rewards and incentives based on a customer’s historic play. The latter we would normally regard as an aspect of marketing and not as tantamount to a prize related to specific gambling.

**5.3** Table 1 on the following page provides examples of types of bonuses and incentives. In the examples set out below, numbers 1 to 5 are linked to the current gamble or session and equipment which stores or processes the relevant data would therefore be remote gambling (key) equipment. Examples 6 – 13 are not linked to the current gamble or session and only operate to calculate rewards and incentives based on a customer’s historic play.

**Table 1**

	“type”	Linkage to gamble	Qualification for bonus	Reward example
<i>linked to current gamble or current session (gaming)</i>				
1	Game feature (random)	Current game (random)	Triggered by random event	Get 3 cherries on any TootyFruity game and win a free spin
2	Game feature (random)	Current game (random)	Triggered by random event	Pineapple feature doubles the win on your TootyFruity winning line
3	Winnings multiplier	Current bet	Placing a specific bet	Place a £10 bet on this match and we'll double your winnings
4	Free game (spend based)	Current session/game (accumulated spend)	Cumulative consecutive spend on single game	Stake £10 over any number of consecutive TootyFruity games and you'll earn a free £1 spin
5	Session spend	Current session (accumulated spend)	Spend in a single session	Stake £50 in this gaming session and we'll put £10 in your account (or give you £10 worth of free credits to spend in the game)
<i>Not linked to current gamble or current session</i>				
6	Loyalty scheme (points)	Current bet / accumulated spend	Accumulated amount spent/staked converted to loyalty points	For every whole £1 staked we'll give you 1 loyalty point - 100 pts may be redeemed for £10 (or a £10 free bet)
7	Loyalty scheme (cash / free bet)	Accumulated spend	Amount staked	Once you reach a total staked of £50 we'll put £10 into your account (or give you a free £10 bet)
8	Loyalty scheme (commission)	Accumulated activity over time-period	Amount regularly spent ( <u>peer to peer</u> )	Varied commission bands depending on customer spend
9	Monthly loyalty bonus	Accumulated activity over time-period	Amount spent in specific timeframe	For every whole £20 staked in August, we'll give you a £10 free bet (or put £10 in your account)
10	Playing time	Accumulated duration of play	Amount of time spent playing	We'll put £5 into your account for every hour you play at poker
11	Deposit matching	Unrelated / accumulated spend	Registration, deposit amount <u>and</u> total amount staked	Register and deposit £30 and we'll put £30 into your account <i>after</i> your total stakes have exceeded £50
12	Deposit matching	Unrelated	Registration, deposit amount	Register and deposit £10 and we'll add another £10 to your account
13	Good will campaigns	Unrelated to gambling activity	Non-gambling customer attribute	Happy birthday ... we've put £10 in your account (or have a free £10 bet on the tennis)

## 6 Client application download servers

- 6.1** Games may be deployed using a “client application”, that is, a piece of software that is downloaded by and installed on the end-user’s device to present a rich graphical and auditory interface that represents the game. Client applications are designed for a range of end-user devices including PCs, mobile phones or set-top boxes (interactive digital TV).
- 6.2** Operators may deploy specific equipment to make client applications available for download. To improve the speed with which the customer is able to download the application, such equipment may be placed in a number of geographical locations. Typically the equipment is also used to download patches and upgrades to the application and to verify the integrity of the installed application, that is, to check that the client software has not been tampered with before permitting access to gaming.
- 6.3** In the context of download servers, the Commission would not normally consider equipment that is used as described above as being used in the provision of facilities for gambling, as long as that equipment is only being used as a means of distributing, updating and checking applications to be installed on the end-user’s device and is not involved once the gambling commences. To meet this distinction the same equipment must not be used to determine the results of virtual events, pass on the contents of gambles from the client application to the server, nor pass results from the server to the client.
- 6.4** For example, an offshore operator may choose to place a server in Great Britain that is used for downloading game applications but once the client application has been installed and the gaming has commenced the equipment is no longer involved. In that case the operator would not require a licence.
- 6.5** If however, an operator located a download server in Great Britain that was also used during gaming to exchange information about the content of the customer’s gamble and the results of the virtual event, this equipment would, under our interpretation, be used in the provision of facilities for gambling. We would consider such equipment as being used “to present, to persons who are participating or may participate in the gambling, a virtual game, virtual race or other virtual event or process by reference to which the gambling is conducted” (s36(4)(b)). Therefore, in this example the operator would have to hold a remote casino licence.

## 7 Business continuity arrangements

- 7.1** Organisations will have in place systems and technologies that are intended to reduce the likelihood of operational downtime, prevent data loss, and to provide business continuity in the event of equipment failure, scheduled maintenance or loss of an operational data centre.
- 7.2** The equipment used for these purposes is likely to contain components and data set out in Table 2. In considering whether such systems are remote gambling equipment, the Commission draws a distinction between equipment used to store a backup of operational data for a gambling system and equipment that is used as a standby or disaster recovery system.
- 7.3** The Commission defines standby and disaster recovery equipment as equipment that the operator intends to use in, or as a replacement for, the ‘live’ system in the event that the equipment normally used is unavailable. Standby and disaster recovery equipment is, therefore, intended to be used in the provision of facilities for gambling and any such equipment used to deploy the components identified in table 2 would be remote gambling equipment, which if sited in Great Britain would require the operator to hold a form of remote gambling licence.

- 7.4** For example, if an operator’s primary gaming system is located outside of Great Britain, but they choose to have a disaster recovery facility in Great Britain, which would become their live gaming system in the event that their primary data centre became unavailable, the operator would require a remote casino licence.
- 7.5** The Commission has also considered whether equipment that stores back-up data for gambling systems is remote gambling equipment. We define equipment used to store back-up data as equipment that holds a copy of operational data but which will not itself be used as part of the ‘live’ gambling system. The data will instead be restored onto ‘live’, standby or disaster recovery equipment. We would not normally consider such equipment to be “used in the provision of facilities for gambling”.
- 7.6** For example, if an operator has a betting system located outside Great Britain but uses equipment in Great Britain to keep a mirror copy of their operational data, this operator will not require a remote betting licence as long as that equipment is only used to enable the data to be restored onto the offshore system and never itself used to provide facilities for gambling.

## **8 Remote gambling equipment**

- 8.1** Whether or not any piece of equipment that is used in the provision of facilities for gambling will be classified as ‘remote gambling equipment’ is determined by the components that reside on it. If any of the components perform the functions listed in section 36(4) of the Act, then that piece of equipment is remote gambling equipment<sup>1</sup>, regardless of what other components may be deployed on the equipment. Based on our present understanding of remote gambling systems, Table 2 summarises the components that meet our interpretation of the definition set out in the Act where they are used in the provision of facilities for gambling. A more detailed description of the components can be found in the Component Glossary.
- 8.2** Table 2 below identifies components that meet our interpretation of the definition set out in the Act.

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<sup>1</sup> By virtue of Section 36(5), the Act excludes client devices, such as home PCs or mobile phones unless these devices are provided by an operator to enable a person to take advantage of facilities for gambling provided by that operator.

**Table 2**

Component	Act ref	Brief Description
<b><i>Presentation Components</i></b>		
Virtual Event and game 'Pages'	Section 36 (4)b	<p>Equipment that serves 'pages' or other media that present virtual events on which people may gamble, including:</p> <ul style="list-style-type: none"> <li>▪ internet web pages (web server)</li> <li>▪ digital television (dTV server) 'pages' mobile 'pages' (WAP / mobile server)</li> </ul> <p>Equipment from which 'client applications' that present virtual events for gambling are downloaded, only where this equipment is used in the provision of facilities for gambling (see section 6 on Client application download servers)</p>
<b><i>Application Components</i></b>		
Virtual Event Controller	Section 36 (4)c	Determining the result of a virtual event based on RNG output
Settling	Section 36 (4)c	Marking up (as winner or loser) and settling (determining the amount to be paid) of gambles
Random Number Generator	Section 36 (4)c	Generation of random data to be used by games / events
<b><i>Data Components</i></b>		
Gambling Transaction Record	Section 36 (4)a and d	<p>Stored information about:</p> <p>An individual's gambling transactions (e.g. £10 single on Trap 3 in the 4.37 at Monmore, 01/12/06), bet logs, game logs.</p> <p>The results of an individual's gamble, e.g. win/loss amounts, including summarised information about an individuals wins or losses, where this is used in the provision of facilities for gambling (see section 4 on Facilities for gambling and remote gambling equipment)</p>
Virtual Event State	Section 36 (4)a and d	Information stored in order to keep track of the last known state of a virtual event or virtual game that an individual participated in

## 9 Gambling systems overview

- 9.1 For the purpose of this document, gambling systems have been logically separated into five layers:

**End-User Devices:** the device used by the customer to access the gambling facilities. Some devices may be used in different ways, for example a mobile phone could access via specialised Java applications ('client application') provided by the operator or via the phone's built-in browser.

**Presentation & Formatting:** components concerned with the presentation and formatting of information that will be displayed on the end-user device and components that provide specialised interfaces for client applications (eg Betting Exchange Client, Casino Client).

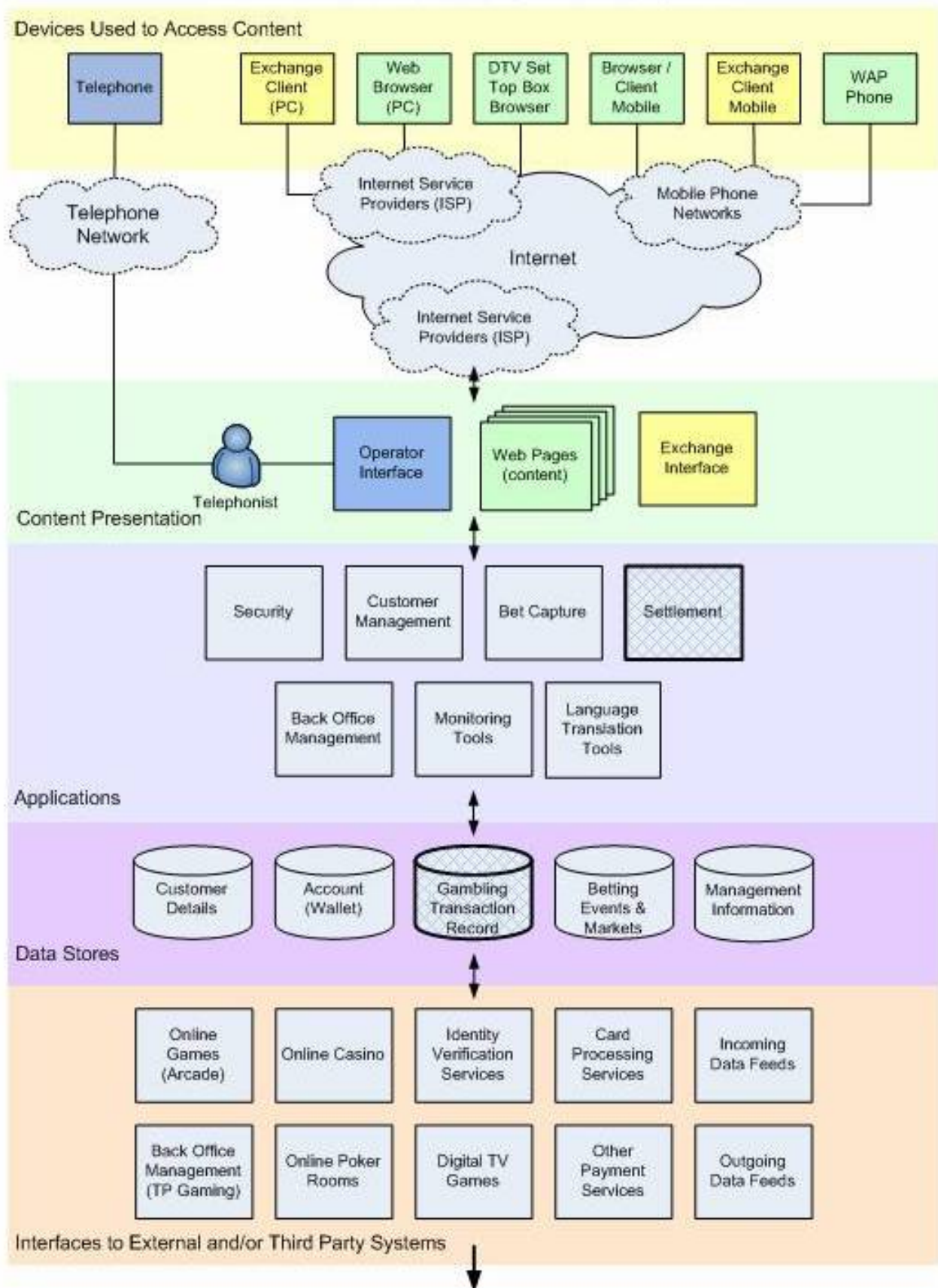
**Applications:** the software components that process incoming or outgoing information, each providing a particular function, such as settling, or account management.

**Data Storage:** where data is physically stored after it has been processed by applications.

**External Interfaces:** components that handle communication with external systems, for example, between a sportsbook and a card processing service or Poker Room.

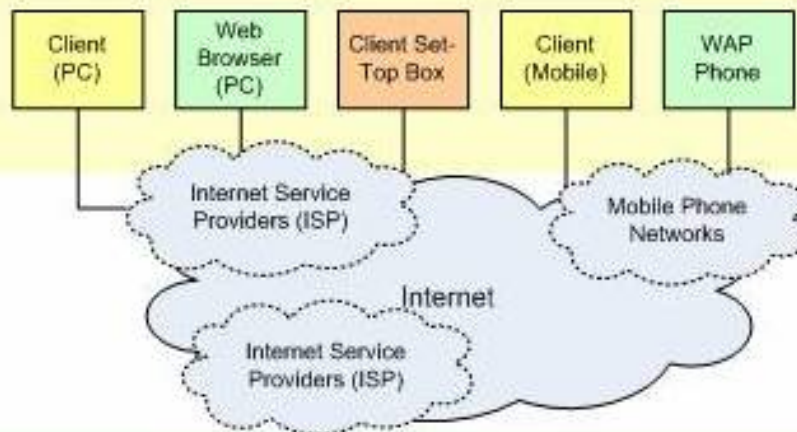
- 9.2 Traditional betting (eg sportsbook) and virtual event gambling (such as casino gaming, arcade, poker, virtual horse racing) systems have been considered separately for several reasons. Virtual event and betting systems use different terminology and have distinct technical impacts on the systems required to support them.
- 9.3 Virtual event systems require random inputs in order to determine the outcome of games, which are normally provided by internal or external Random Number Generators. Virtual event systems may also support multi-player games where multiple players 'sit' at the same table (whether they play against each other or against the house) and require systems to support multi-player tables.
- 9.4 Betting systems rely on external sources of information to determine the outcome of bets (eg sporting results), which are provided automatically through electronic 'data feeds' (eg from Satellite Information Services (SIS) or the Press Association (PA)) or are entered manually.
- 9.5 Some operators offer both betting ('sportsbooks') and virtual event gambling (such as online 'casinos', 'arcades', poker). For technical, commercial, and jurisdictional reasons these systems may be deployed separately. For example, British sportsbook operators may offer casino gambling from off-shore locations. The casinos may be hosted by third party providers and these providers may host 'virtual' casinos for several different operators on the same equipment. The operator allows the customer to purchase chips or tokens to take to the casino. The offshore host provides a 'shadow' account and transactional systems that keep track of the customer's chip/token balance and gambling activity ('bet record' or 'game log'). The betting system, in this instance, does not keep a record of the casino gaming activities, just a record of funds taken to and from the casino.
- 9.6 Poker (and similar) gambling represents a somewhat special case. Many operators offer their 'poker rooms' through a third party provider. Shared poker rooms are managed by a provider on behalf of a number of their licensees. As with integrated casinos, players normally purchase tokens/chips, which are transferred to the poker room and held in a shadow account.
- 9.7 The following pages present some simplified diagrams intended to represent the sort of components found in various types of gambling system. Items highlighted with bold text and cross-hatching fulfil our interpretation of remote gambling equipment.
- 9.8 Software can be deployed within remote gambling infrastructures in any number of ways. Although some operators will have dedicated presentation, application, data and interface servers, many operators will not. These logical diagrams do not, therefore, necessarily map directly onto any particular server infrastructure.

## Simplified Sportsbook / Betting Exchange Model



## Simplified Stand-Alone Virtual Event (Casino/Arcade) Model

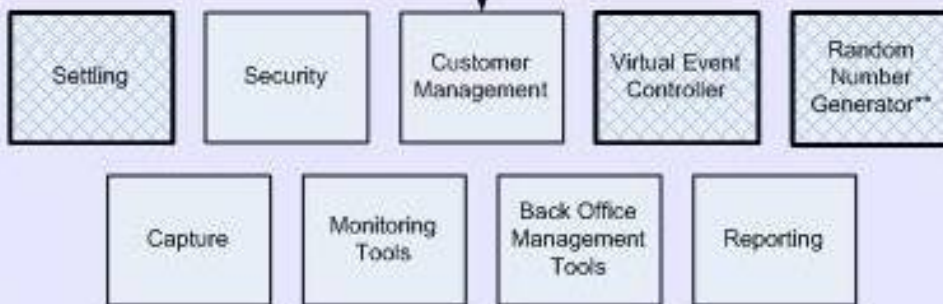
### Devices Used to Access Content



\* only key equipment if used in the provision of facilities for gambling (see section 6)



### Content Presentation



### Applications

\*\*Internal or external RNGs may be used



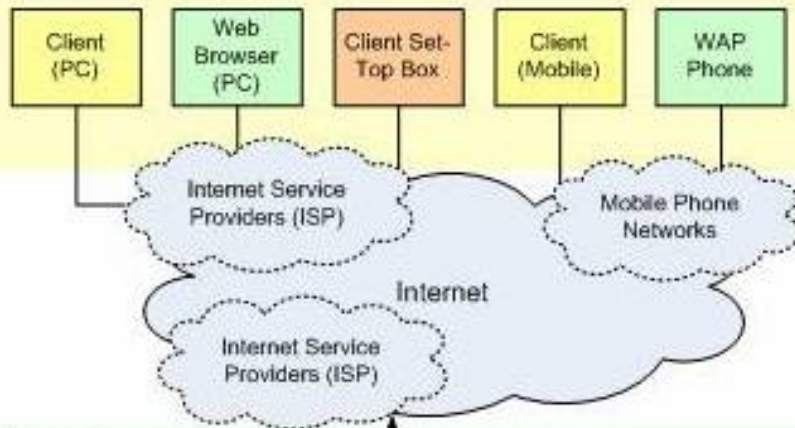
### Data Stores



### Interfaces to External and/or Third Party Systems

## Simplified Integrated Virtual Event & Sportsbook Model

### Devices Used to Access Content



\* only key equipment if used in the provision of facilities for gambling (see section 5)



### Content Presentation



### Applications

\*\*Internal or external RNGs may be used



### Data Stores

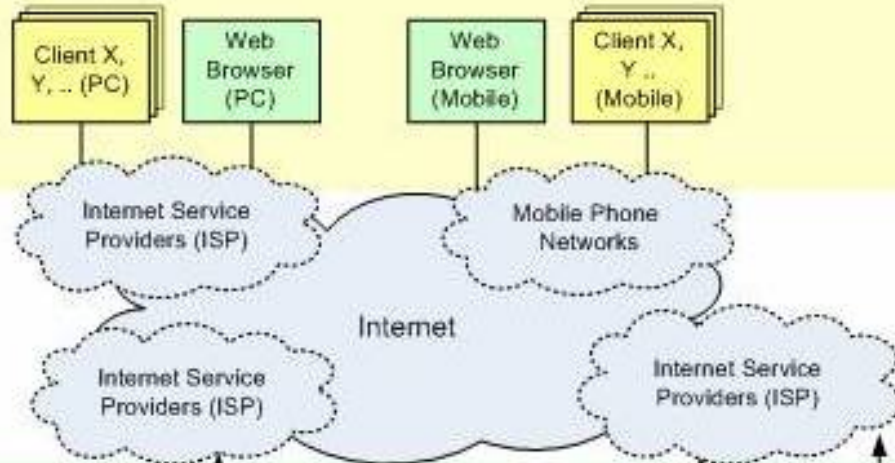


### Interfaces to External and/or Third Party Systems



## Simplified Shared Poker Room Model

### Devices Used to Access Content



\* only key equipment if used in the provision of facilities for gambling (see section 6)



### Content Presentation

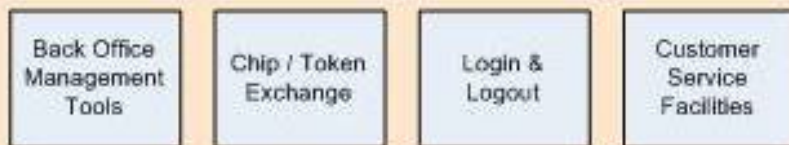


### Applications

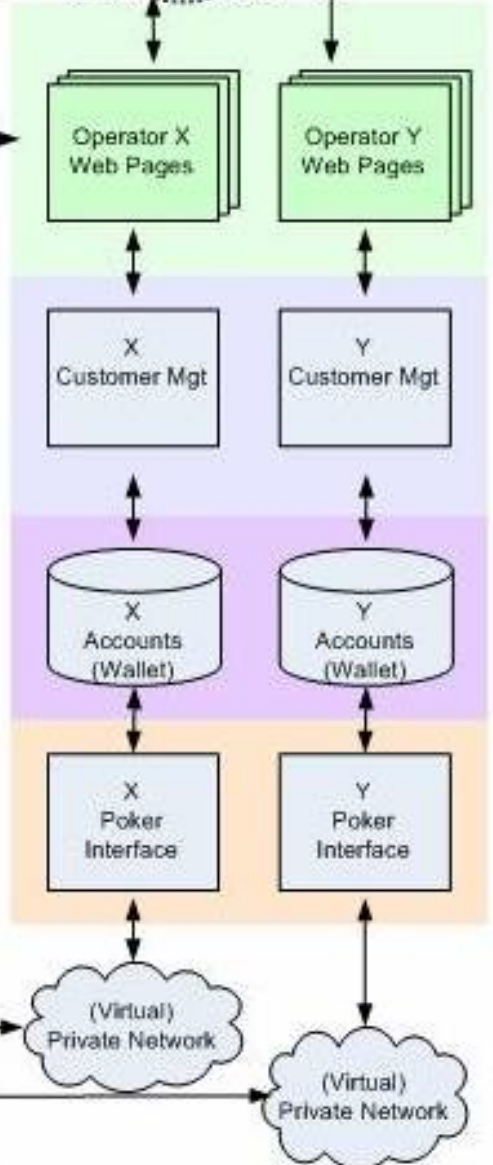
\*\*Internal or external RNGs may be used



### Data Stores



### Interfaces to Operators X, Y, ...



## Component Glossary

### Devices

Many client devices can be used to interact with the gambling systems. The devices themselves may utilise different methods to interact with the gambling system. The software tool or application the customer actually interacts with is known as the 'user interface'; the three most common types of which are outlined below. Customer's devices are explicitly excluded from being classified as gambling equipment by the Gambling Act<sup>2</sup>.

**Browsers** are non-specific applications that can be used to view any web page and may be on any supported device, such as a PC, mobile phone or other portable device.

**Client applications** have been developed specifically by operators or software developers to communicate with the core gambling system. Client applications typically provide a 'richer' visual and functional environment than can be achieved using a web browser. Importantly (for security) client applications do not contain any software that determines the result of a bet.

**Telephones** may be used to interact directly with the gambling system using touch-tone, Intelligent Voice Recognition (IVR) systems or via a telephonist.

### Presentation/formatting

It is common practice to deploy those software components concerned with the presentation or formatting of content (eg Web pages) and direct connection to end-user devices (eg Interfaces) on separate dedicated servers. These servers communicate with the rest of the infrastructure over communications networks which may be local or remote.

### Web pages (content)

Web pages present text or graphical information to customers. The web page allows the customer to interact with a gambling system and brings together various sources of information allowing them to view their account history, gambling history, movement of funds between systems (eg sportsbook to casino) and to amend (permissible) details. For a betting operator these pages would normally be referred to as their 'sportsbook'. Web pages are also commonly used to display marketing, help or contact information. Web pages that contain animated or video content for virtual events are considered separately (see 'virtual event web pages').

### Virtual event web pages

Virtual event web pages contain graphics, animation, text and sometimes sound that represents a game or other virtual event and displays results via the customer's browser. Several technologies are used including flash, java, shockwave, and mpeg-4.

### Exchange/casino/arcade/sportsbook/digital TV application interfaces

Application Interfaces provide a way for remote client applications to interact with the core gambling system. The interface typically handles formatting and exchange of messages. Betting Exchanges typically use a dedicated client application in order to support the relatively rich content that the customer needs in order to be able to interact with the betting exchange. Similarly casino, arcades, sportsbook and digital TV interfaces are used to manage communication with specific client applications.

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<sup>2</sup> By virtue of Section 36(5), the Act excludes client devices, such as home PC's or mobile phones unless these devices are provided by an operator to enable a person to take advantage of facilities for gambling provided by that operator.

### **Download manager**

Download managers store client applications and make them available for customers to download to their device (mobile phone, PC, etc). They may also keep track of versions and intelligently download newer versions or patches to existing client applications.

### **Telephonist user interface**

The operator user interface provides a means for the telephonist to capture customer details, bets, financial transactions and queries.

## **Applications**

Applications may be deployed on a one-to-one basis (one application per server) however it is more common for multiple applications reside on the same physical piece of equipment for reasons of economy and performance.

### **System monitoring tools**

Monitoring tools are frequently used to monitor the technical aspects of the gambling system including performance, resource utilisation, or the performance or interaction with external systems.

### **Reporting**

Reporting applications gather and summarise information from the system, providing reports on most aspects of the system including ongoing liability, virtual event statistics, account activity (for example, large bets, large wins, summarised information) and profit/loss reports. Reports may be scheduled to run at particular times of day, run manually or triggered by unusual activities ('alerts').

### **Bet capture/bet matching**

The capture component processes the information about the customer's gamble, validating the selections against the rules of the particular bet type, game or event/market before it is stored in the gambling transaction record. For a betting exchange this component would be the 'bet matching' component.

### **Customer management**

Customer management applications provide facilities for customers to register their details, deposit funds, update account details and view their account history. Customer Support personnel use the same or similar components to manage aspects of customers accounts.

### **Settling**

Settling is sometimes referred to in two parts, 'marking-up' (ie identifying individual gambles as winners or losers) and 'settling'. The term settling is used here to represent both parts. Settling determines whether or not a customer has won based on the outcome of some real or virtual event. If the customer has won, the settling component calculates the value of the return to the customer and corresponding adjustments are made to the customers account balance.

### **Random number generator (RNG)**

Random number generators use specialised hardware and software to generate sequences of numbers that are unpredictable, that is, numbers that do not have a detectable pattern. Virtual events always require one or more numbers within a specific range (for example a Roulette game may request a number between 0 and 36). The output of the RNG must be 'scaled' to fit into this range. The scaling component may be part of the RNG, a separate component or part of the game depending on the deployment.

## Virtual event control

Each virtual event has its own rules and behaviour. Virtual event control is used here as a generic term for components that handle:

- placing a request for random numbers and/or receiving random numbers
- the determination of the virtual event result using the random number input
- issuing instructions to the client application to display the result of the event and the result of the customer's gamble

Some virtual event gambling may also require components that coordinate activities in multi-player scenarios.

## Back-office tools

Back-office tools provide a variety of functions that aid the smooth running of the system or allow operational personnel to perform tasks such as pricing and setting limits on betting opportunities, adjusting customer balances (for example, in the case of settlement errors), and changing event configurations.

## Security

Security, for example authorisation and authentication (user-name, password, access rights, etc), and audit trails may be deployed within other components or applications, but may also be deployed as a separate component.

## Data

Data storage is frequently separated from applications and from presentation onto specialised 'database' (DBMS) servers, however, some applications may be operated or processing may occur on database servers and some operators deploy data and applications on the same equipment. The deployment of databases is further complicated because server hardware and the disks that physically store the data may be separate devices. Dedicated (and expensive) data storage equipment is often used by larger operators for performance and management purposes.

Operators normally have some form of back-up or archiving that keeps a copy of data that will be used in the event of loss of the main source of data, either directly or following restoration to the production system.

## Customer details

Customer details include information about the customer, such as name, address, credit and debit cards and other payment-type information and account number(s). Customers may register their details whether they intend to gamble or not.

## Customer account (wallet)

The customer account keeps track of the customer's balance and the transactions into and out of the account. The balance is amended by other components following deposits/payments, withdrawals, gambling transactions, etc. The information stored may also include monies taken to and from other wallets and/or shadow wallets. The account will be linked in some form to customer's gambling transaction records (see below) and may also be linked to external shadow wallets via a reference number or other identifier.

## Shadow account (shadow wallet)

The shadow account or token/chip wallet is only relevant for integrated gambling systems where monies are moved from one product to another. Essentially the shadow account contains the customer's chip/token balance and a reference ID from the originating system.

### **Gambling transaction record (game/bet history)**

This data store may be referred to as a virtual event log, game log, game history, bet log, bet record, or bet history. The gambling transaction record contains the details of the customer's gambling transactions such as selection, stake, odds, and bet type. The gambling transaction record also stores the result (win/loss) of the individual gambling transactions. Gambling transactions are linked to customer accounts, normally via the customer's account number so that account balances may be updated following settling processes.

Summarised information about amounts staked, amounts credited as winnings and amounts taken as losses would also be classed as gambling transaction records.

### **Events & markets**

Information about sporting or other 'real' events, such as location, time and date, competitors, etc. (for example, Arsenal (home) vs Man Utd (away), on the 5th June, at 3pm), are stored along with associated betting markets, (if they exist, eg win/lose/draw) and the current and previous odds (where they exist). This information is commonly received from external sources, such as SIS or the PA in Britain, and is stored by other non-gambling organisations.

### **Virtual event state**

Gambling systems may need to maintain a record of the event state in order to be able to recover interrupted gambling where, for example, a customer loses connectivity to the server part way through a multi-stage game.

### **Management & marketing information**

Management information is non-production data, that is, data that is not intended to be used in 'live' systems in the provision of facilities for gambling. Management information is normally stored separately to be examined at a later point in time. Management information is used to explore trends, betting patterns, popularity of games or types of betting, successful promotions, etc. This may include data for marketing purposes or for the calculation of bonuses or incentives based on customer's accumulated gambling activity.

### **External interfaces**

Interfaces to external systems (often referred to as Application Programming Interfaces or APIs) could be deployed anywhere within the infrastructure, though larger operators will often have dedicated equipment. Interfaces support the exchange of information with other organisations or other systems. Gambling systems have a variable number of external interfaces depending on the size and scope of the operation. As noted earlier, many operators offer sportsbook and virtual events including 'casinos' and 'poker rooms' often hosted/managed on their behalf by third parties. To gamble using these systems the customer purchases chips/token and the Interfaces are used to exchange information about the value of these and minimal information about the customer's identity (often just a reference ID).

## **Disaster recovery & backup data**

### **Disaster recovery**

Most of the larger operators and many of the smaller ones have some kind of disaster recovery (DR) facility. DR facilities require data to be copied from the production infrastructure over to DR infrastructures, which may be identical to or be a trimmed down versions of the production infrastructure. DR facilities are normally only invoked after a significant failure event occurring in the production infrastructure. However, operators may also 'test' their disaster recovery processes and infrastructures by transferring live operations to them for short periods.

### **Backup data**

Backup data is distinct from DR data since it is not intended to be used *directly* as a live source of data. Instead this data is used to restore information to a production facility (or a DR mirror).

## Gambling Commission March 2008

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The Gambling Commission regulates gambling in the public interest. It does so by keeping crime out of gambling, by ensuring that gambling is conducted fairly and openly, and by protecting children and vulnerable people from being harmed or exploited by gambling. The Commission also provides independent advice to government on gambling in Britain.

For further information or to register your interest in the Commission please visit our website at:

**[www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)**

Copies of this document are available in alternative formats on request.

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